

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ABDUL K. FAKIR, and  
PIPER G. FAKIR,

Defendants.

Civil No.

03-72806

HON.

ARTHUR J. TARNOW

COMPLAINT

MAGISTRATE JUDGE R. STEVEN WHALEN

The United States of America, pursuant to 26 U.S.C. § 7401, at the direction of the Attorney General of the United States and with the authorization of a delegate of the Secretary of the Treasury, brings this civil action against the defendants named above in order to reduce to judgment federal joint income tax assessments made by the Internal Revenue Service against Abdul K. Fakir and Piper G. Fakir (hereinafter "Taxpayers"), as set forth more fully herein. For its complaint, the United States alleges that:

1. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1340 and 1345, and 26 U.S.C. § 7402(a).
2. Taxpayers reside at 19107 Burlington Drive, Detroit, Michigan 48203.

3. On or about the following dates, a delegate of the Secretary of the Treasury made the following joint income tax assessments in the following amounts against Taxpayers, jointly and severally, for the tax years:

<u>YEAR</u>	<u>DATE OF ASSESSMENT</u>	<u>INCOME TAX</u>	<u>PENALTIES</u>	<u>INTEREST</u>
1988	September 20, 1993	\$46,724.00	\$17,773.33	\$23,294.50
1990	October 18, 1993	\$13,855.00	\$2,823.20	\$1,754.16
1991	July 26, 1993	\$145,194.00	\$44,145.17	\$16,078.12
1992	July 4, 1994	\$97,029.00	\$33,319.50	\$9,769.85
1993	September 26, 1994	\$118,578.00	\$6,836.80	\$2,986.28
1994	May 29, 1995	\$157,707.00	\$8,901.80	\$1,886.57
1995	May 20, 1996	\$128,545.00	\$3,046.71	\$494.48
1996	October 13, 1997	\$127,254.00	\$10,070.47	\$1,924.69
1997	July 5, 1999	\$132,893.00	\$47,915.54	\$14,470.06
1998	February 28, 2000	\$149,644.00	\$40,394.36	\$11,281.02
1999	January 1, 2001	\$148,667.00	\$22,625.95	\$8,400.37
2000	April 9, 2001	\$142,342.00	\$9,082.03	\$3,435.28
2001	November 25, 2002	\$74,128.00	\$5,521.05	\$2,611.48

4. After the dates of the assessments set forth above, a delegate of the Secretary of the Treasury gave notice of the respective assessments and made demand for payment of the assessments upon Taxpayers.

5. Despite such notice and demand, Taxpayers have failed, neglected or refused to pay their tax liabilities in full, and, after the application of all abatements, payments and credits, Taxpayers remain liable, jointly and severally, to the United States for the unpaid assessed

balance of \$1,374,250.00, and a total outstanding balance, including accrued interest as of June 30, 2003, in the amount of \$2,606,637.67.

WHEREFORE, the United States of America prays for judgment in its favor and against Taxpayers as follows:

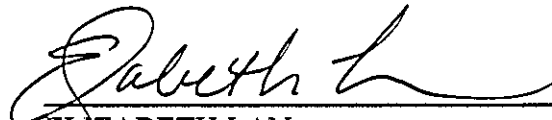
A. That the United States be granted judgment against the defendants Abdul K. Fakir and Piper G. Fakir, jointly and severally, for the assessments described in the complaint, less any credits, plus interest, penalties and other costs accruing under law since the dates the assessments were made;

B. That the Court grant the United States its fees and costs, and such other and further relief as the Court deems proper.

JEFFREY G. COLLINS  
United States Attorney



Assistant U.S. Attorney



ELIZABETH LAN  
Trial Attorney, Tax Division  
U.S. Department of Justice  
Post Office Box 55  
Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 307-6550